

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: EILEEN CERA	:	CASE No. 18-17724-ELF
aka EILEEN SCHUELLER	:	Chapter 13
Debtor	:	
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EXETER FINANCE, LLC,	:	
Movant	:	
v.	:	Hearing Date: February 4, 2020
EILEEN CERA	:	Hearing Time: 9:30 a.m.
aka EILEEN SCHUELLER, and	:	US Bankruptcy Court
DANIEL SCHUELLER, Codebtor	:	Robert Nix Building
Respondent(s)	:	900 Market Street, Suite 400
	:	Philadelphia
and	:	Courtroom 1
	:	
WILLIAM C. MILLER, ESQ.	:	
Trustee	:	

**RESPONSE OF DEBTOR TO
MOTION FOR RELIEF FROM AUTOMATIC STAY**

Debtor, EILEEN CERA aka EILEEN SCHUELLER by her attorney John M. Kenney, hereby responds to the Motion for Relief of Exeter Finance, LLC from the Automatic Stay, and responds accordingly as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The debtor can neither admit nor deny the allegations contained in Paragraph 6 of the motion and same are denied as such.
7. Denied. On information and belief, Debtor has made the required post-petition payments but will cure any outstanding payments, if any.
8. Denied. The debtor can neither admit nor deny the allegations contained in Paragraph 8 of

the motion and same are denied as such.

9. Denied.

10. Admitted.

11. Denied. It is denied that Movant is entitled to the relief requested.

12. Denied. It is denied that Movant is entitled to the relief requested.

13. Admitted.

14. Denied. It is denied that the Movant be granted waiver of Rule 4001(a)(3).

WHEREFORE, Debtor, Eileen Cera aka Eileen Schueller, hereby prays this court would deny and dismiss the Motion of Exeter Finance, LLC for Release in Automatic Stay.

Date: January 10, 2020

/s/ John M. Kenney
JOHN M. KENNEY, ESQ.
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